

Barbara Moses
Admitted Pro Hac Vice
Sarah Turk
Legal Intern, D.N.J.L. Civ. R. 101.1(h)
Jennifer Vasquez
Legal Intern, D.N.J.L. Civ. R. 101.1(h)
SETON HALL UNIVERSITY
SCHOOL OF LAW
CENTER FOR SOCIAL JUSTICE
833 McCarter Highway
Newark, New Jersey 07102
(973) 642-8700

Jeffrey S. Chiesa
Attorney General of New Jersey
Susan J. Dougherty
Deputy Attorney General
David L. DaCosta
Deputy Attorney General
NEW JERSEY DIVISION OF LAW
R.J. Hughes Justice Complex
25 Market Street, 8th Floor
P.O. Box 112
Trenton, NJ 08625
(609) 341-3689

Lawrence S. Lustberg
Jonathan M. Manes
Admission to D.N.J. Pending
GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102
(973) 596-4500

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

RAYMOND ALVES, et al.,

Plaintiffs,

v.

MERRILL MAIN, Ph.D., et al.,

Defendants.

No. 01 Civ. 0789 (DMC) (MF)
(Consolidated)

[PROPOSED] ORDER

This matter having been opened to the Court jointly by counsel for Plaintiffs and Defendants (collectively the "Parties"); and

The Court having conducted a fairness hearing pursuant to Rule 23 of the Fed.R. Civ. P., and having considered the joint motion of the Parties and the objections of the Class, and for the reasons set forth in the accompanying opinion; and

For good cause shown, it is hereby

ORDERED this __ day of September, 2012, as follows:

1. The Settlement Agreement between Plaintiffs and Defendants is hereby approved.
2. _____ is hereby appointed as an independent Monitor to facilitate the implementation of the Settlement Agreement in accordance with Section VII of the Settlement Agreement.
3. The Center for Social Justice at Seton Hall University School of Law is hereby awarded the sum of \$78,000 in attorneys' fees as negotiated by the Parties.
4. With respect to cases that have previously been consolidated into this action by prior Orders of this Court (the "Consolidated Actions"), all claims in such actions other than claims that have been asserted in the Second Amended Complaint [Dkt. 147] are hereby severed from this action and may be separately adjudicated, upon Order of the Court after motion of plaintiff specifying which severed claims he still wishes to pursue, under the docket number assigned to the case prior to consolidation .
5. All claims asserted in the Consolidated Actions that have been asserted in the Second Amended Complaint [Dkt. 147] remain consolidated in this action.
6. The Second Amended Complaint [Dkt 147] is hereby conditionally dismissed, and the case is hereby placed on the Court's inactive docket to remain there during the term of this Settlement Agreement as a means of ensuring compliance of the Parties with the Settlement Agreement.

Honorable Denis M. Cavanaugh, U.S.D.J.